

#526

WIECHERT, MUNK & GOLDSTEIN, PC
 David Wiechert, CA Bar No. 94607
 4000 MacArthur Boulevard,
 Suite 600 East Tower
 Newport Beach, CA 92660
 Phone: (949) 361-2822
 Facsimile: (949) 361-5722
 Email: dwiechert@aol.com

MORVILLO ABRAMOWITZ
 GRAND IASON & ANELLO PC
 Jonathan S. Sack (*pro hac vice*)
 Alexander F.R. Peacocke (*pro hac vice*
 pending)
 565 Fifth Avenue
 New York, New York 10017
 Phone: (212) 856-9600
 Facsimile: (212) 856-9494
 Email: jsack@maglaw.com
 Email: apeacocke@maglaw.com

*Attorneys for Specially Appearing
 Defendant David Tassillo*

COHEN & GRESSER LLP
 Jason Brown (*pro hac vice*)
 Matthew V. Povolny (*pro hac vice*)
 Joanna Chan
 800 Third Avenue
 New York, New York 10022
 Phone: (212) 957-7600
 Facsimile: (212) 957-4514
 Email: jbrown@cohengresser.com
 Email: mpovolny@cohengresser.com
 Email: jchan@cohengresser.com

*Attorneys for Specially Appearing
 Defendant Feras Antoon*

**UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA**

K.A.,

Plaintiff,

v.

MINDGEEK S.A.R.L. a foreign entity;
 MG FREESITES, LTD., a foreign entity;
 MINDGEEK USA INCORPORATED, a
 Delaware corporation; MG PREMIUM
 LTD, a foreign entity; MG GLOBAL
 ENTERTAINMENT INC., a Delaware
 corporation; 9219-1568 QUEBEC, INC.,
 foreign entity; BERND BERGMAIR, a
 foreign individual; FERAS ANTOON, a
 foreign individual; DAVID TASSILLO, a
 foreign individual; VISA INC., a Delaware
 corporation; REDWOOD CAPITAL
 MANAGEMENT, LLC, a Delaware
 limited liability company; REDWOOD
 DOE FUNDS 1-7; COLBECK CAPITAL
 MANAGEMENT, LLC, a Delaware
 limited liability company; COLBECK
 DOE FUNDS 1-3,

Defendants.

Case No. 2:24-cv-04786-WLH-
 ADS

**[PROPOSED] ORDER
 GRANTING ANTOON AND
 TASSILLO'S OMNIBUS
 MOTION TO DISMISS THE
 COMPLAINTS**

Hearing Date: January 31, 2025
 Hearing Time: 1:30 p.m.
 Courtroom: 9B
 Judge: Hon. Wesley Hsu
 Complaint Filed: June 7, 2024
 Trial Date: not set

**[PROPOSED] ORDER GRANTING ANTOON AND TASSILLO'S
 OMNIBUS MOTION TO DISMISS THE COMPLAINTS**

N.L.,

#527

Plaintiff,

v.

MINDGEEK S.A.R.L. a foreign entity;
 MG FREESITES, LTD., a foreign entity;
 MINDGEEK USA INCORPORATED, a
 Delaware corporation; MG PREMIUM
 LTD, a foreign entity; MG GLOBAL
 ENTERTAINMENT INC., a Delaware
 corporation; 9219-1568 QUEBEC, INC.,
 foreign entity; BERND BERGMAIR, a
 foreign individual; FERAS ANTOON, a
 foreign individual; DAVID TASSILLO, a
 foreign individual; VISA INC., a Delaware
 corporation; REDWOOD CAPITAL
 MANAGEMENT, LLC, a Delaware
 limited liability company; REDWOOD
 DOE FUNDS 1-7; COLBECK CAPITAL
 MANAGEMENT, LLC, a Delaware
 limited liability company; COLBECK
 DOE FUNDS 1-3,

Defendants.

L.T.,

Plaintiff,

v.

MINDGEEK S.A.R.L. a foreign entity;
 MG FREESITES, LTD., a foreign entity;
 MINDGEEK USA INCORPORATED, a
 Delaware corporation; MG PREMIUM
 LTD, a foreign entity; MG GLOBAL
 ENTERTAINMENT INC., a Delaware
 corporation; 9219-1568 QUEBEC, INC.,
 foreign entity; BERND BERGMAIR, a
 foreign individual; FERAS ANTOON, a
 foreign individual; DAVID TASSILLO, a
 foreign individual; VISA INC., a Delaware
 corporation; REDWOOD CAPITAL
 MANAGEMENT, LLC, a Delaware
 limited liability company; REDWOOD
 DOE FUNDS 1-7; COLBECK CAPITAL
 MANAGEMENT, LLC, a Delaware
 limited liability company; COLBECK
 DOE FUNDS 1-3,

Defendants.

Case No. 2:24-cv-04788-WLH-
 ADS

Hearing Date: January 31, 2025
 Hearing Time: 1:30 p.m.
 Courtroom: 9B
 Judge: Hon. Wesley Hsu
 Complaint Filed: June 7, 2024
 Trial Date: not set

Case No. 2:24-cv-04791-WLH-
 ADS

Hearing Date: January 31, 2025
 Hearing Time: 1:30 p.m.
 Courtroom: 9B
 Judge: Hon. Wesley Hsu
 Complaint Filed: June 7, 2024
 Trial Date: not set

T.C., #528

Plaintiff,

v.

MINDGEEK S.A.R.L. a foreign entity;
MG FREESITES, LTD., a foreign entity;
MINDGEEK USA INCORPORATED, a
Delaware corporation; MG PREMIUM
LTD, a foreign entity; MG GLOBAL
ENTERTAINMENT INC., a Delaware
corporation; 9219-1568 QUEBEC, INC.,
foreign entity; BERND BERGMAIR, a
foreign individual; FERAS ANTOON, a
foreign individual; DAVID TASSILLO, a
foreign individual; VISA INC., a Delaware
corporation; REDWOOD CAPITAL
MANAGEMENT, LLC, a Delaware
limited liability company; REDWOOD
DOE FUNDS 1-7; COLBECK CAPITAL
MANAGEMENT, LLC, a Delaware
limited liability company; COLBECK
DOE FUNDS 1-3,

Defendants.

X.N.,

Plaintiff,

v.

MINDGEEK S.A.R.L. a foreign entity;
MG FREESITES, LTD., a foreign entity;
MINDGEEK USA INCORPORATED, a
Delaware corporation; MG PREMIUM
LTD, a foreign entity; MG GLOBAL
ENTERTAINMENT INC., a Delaware
corporation; 9219-1568 QUEBEC, INC.,
foreign entity; BERND BERGMAIR, a
foreign individual; FERAS ANTOON, a
foreign individual; DAVID TASSILLO, a
foreign individual; VISA INC., a Delaware
corporation; REDWOOD CAPITAL
MANAGEMENT, LLC, a Delaware
limited liability company; REDWOOD
DOE FUNDS 1-7; COLBECK CAPITAL
MANAGEMENT, LLC, a Delaware
limited liability company; COLBECK
DOE FUNDS 1-3,

Defendants.

Case No. 2:24-cv-04795-WLH-
ADS

Hearing Date: January 31, 2025
Hearing Time: 1:30 p.m.
Courtroom: 9B
Judge: Hon. Wesley Hsu
Complaint Filed: June 7, 2024
Trial Date: not set

Case No. 2:24-cv-04800-WLH-
ADS

Hearing Date: January 31, 2025
Hearing Time: 1:30 p.m.
Courtroom: 9B
Judge: Hon. Wesley Hsu
Complaint Filed: June 7, 2024
Trial Date: not set

N.Y.,

#529

Plaintiff,

v.

MINDGEEK S.A.R.L. a foreign entity;
 MG FREESITES, LTD., a foreign entity;
 MINDGEEK USA INCORPORATED, a
 Delaware corporation; MG PREMIUM
 LTD, a foreign entity; MG GLOBAL
 ENTERTAINMENT INC., a Delaware
 corporation; 9219-1568 QUEBEC, INC.,
 foreign entity; BERND BERGMAIR, a
 foreign individual; FERAS ANTOON, a
 foreign individual; DAVID TASSILLO, a
 foreign individual; VISA INC., a Delaware
 corporation; REDWOOD CAPITAL
 MANAGEMENT, LLC, a Delaware
 limited liability company; REDWOOD
 DOE FUNDS 1-7; COLBECK CAPITAL
 MANAGEMENT, LLC, a Delaware
 limited liability company; COLBECK
 DOE FUNDS 1-3,

Defendants.

J.C.,

Plaintiff,

v.

MINDGEEK S.A.R.L. a foreign entity;
 MG FREESITES, LTD., a foreign entity;
 MINDGEEK USA INCORPORATED, a
 Delaware corporation; MG PREMIUM
 LTD, a foreign entity; MG GLOBAL
 ENTERTAINMENT INC., a Delaware
 corporation; 9219-1568 QUEBEC, INC.,
 foreign entity; BERND BERGMAIR, a
 foreign individual; FERAS ANTOON, a
 foreign individual; DAVID TASSILLO, a
 foreign individual; VISA INC., a Delaware
 corporation; REDWOOD CAPITAL
 MANAGEMENT, LLC, a Delaware
 limited liability company; REDWOOD
 DOE FUNDS 1-7; COLBECK CAPITAL
 MANAGEMENT, LLC, a Delaware
 limited liability company; COLBECK
 DOE FUNDS 1-3,

Defendants.

Case No. 2:24-cv-4801-WLH-
 ADS

Hearing Date: January 31, 2025
 Hearing Time: 1:30 p.m.
 Courtroom: 9B
 Judge: Hon. Wesley Hsu
 Complaint Filed: June 7, 2024
 Trial Date: not set

Case No. 2:24-cv-04971-WLH-
 ADS

Hearing Date: January 31, 2025
 Hearing Time: 1:30 p.m.
 Courtroom: 9B
 Judge: Hon. Wesley Hsu
 Complaint Filed: June 12, 2024
 Trial Date: not set

W.L., #530

Plaintiff,

v.

MINDGEEK S.A.R.L. a foreign entity;
MG FREESITES, LTD., a foreign entity;
MINDGEEK USA INCORPORATED, a
Delaware corporation; MG PREMIUM
LTD, a foreign entity; MG GLOBAL
ENTERTAINMENT INC., a Delaware
corporation; 9219-1568 QUEBEC, INC.,
foreign entity; BERND BERGMAIR, a
foreign individual; FERAS ANTOON, a
foreign individual; DAVID TASSILLO, a
foreign individual; VISA INC., a Delaware
corporation; REDWOOD CAPITAL
MANAGEMENT, LLC, a Delaware
limited liability company; REDWOOD
DOE FUNDS 1-7; COLBECK CAPITAL
MANAGEMENT, LLC, a Delaware
limited liability company; COLBECK
DOE FUNDS 1-3,

Defendants.

C.S.,

Plaintiff,

v.

MINDGEEK S.A.R.L. a foreign entity;
MG FREESITES, LTD., a foreign entity;
MINDGEEK USA INCORPORATED, a
Delaware corporation; MG PREMIUM
LTD, a foreign entity; MG GLOBAL
ENTERTAINMENT INC., a Delaware
corporation; 9219-1568 QUEBEC, INC.,
foreign entity; BERND BERGMAIR, a
foreign individual; FERAS ANTOON, a
foreign individual; DAVID TASSILLO, a
foreign individual; VISA INC., a Delaware
corporation; REDWOOD CAPITAL
MANAGEMENT, LLC, a Delaware
limited liability company; REDWOOD
DOE FUNDS 1-7; COLBECK CAPITAL
MANAGEMENT, LLC, a Delaware
limited liability company; COLBECK
DOE FUNDS 1-3,

Defendants.

Case No. 2:24-cv-04977-WLH-ADS

Hearing Date: January 31, 2025
Hearing Time: 1:30 p.m.
Courtroom: 9B
Judge: Hon. Wesley Hsu
Complaint Filed: June 13, 2024
Trial Date: not set

Case No. 2:24-cv-04992-WLH-ADS

Hearing Date: January 31, 2025
Hearing Time: 1:30 p.m.
Courtroom: 9B
Judge: Hon. Wesley Hsu
Complaint Filed: June 13, 2024
Trial Date: not set

S.O., #531

Plaintiff,

v.

MINDGEEK S.A.R.L. a foreign entity;
MG FREESITES, LTD., a foreign entity;
MINDGEEK USA INCORPORATED, a
Delaware corporation; MG PREMIUM
LTD, a foreign entity; MG GLOBAL
ENTERTAINMENT INC., a Delaware
corporation; 9219-1568 QUEBEC, INC.,
foreign entity; BERND BERGMAIR, a
foreign individual; FERAS ANTOON, a
foreign individual; DAVID TASSILLO, a
foreign individual; VISA INC., a Delaware
corporation; REDWOOD CAPITAL
MANAGEMENT, LLC, a Delaware
limited liability company; REDWOOD
DOE FUNDS 1-7; COLBECK CAPITAL
MANAGEMENT, LLC, a Delaware
limited liability company; COLBECK
DOE FUNDS 1-3,

Defendants.

L.S.,

Plaintiff,

v.

MINDGEEK S.A.R.L. a foreign entity;
MG FREESITES, LTD., a foreign entity;
MINDGEEK USA INCORPORATED, a
Delaware corporation; MG PREMIUM
LTD, a foreign entity; MG GLOBAL
ENTERTAINMENT INC., a Delaware
corporation; 9219-1568 QUEBEC, INC.,
foreign entity; BERND BERGMAIR, a
foreign individual; FERAS ANTOON, a
foreign individual; DAVID TASSILLO, a
foreign individual; VISA INC., a Delaware
corporation; REDWOOD CAPITAL
MANAGEMENT, LLC, a Delaware
limited liability company; REDWOOD
DOE FUNDS 1-7; COLBECK CAPITAL
MANAGEMENT, LLC, a Delaware
limited liability company; COLBECK
DOE FUNDS 1-3,

Defendants.

Case No. 2:24-cv-04998-WLH-ADS

Hearing Date: January 31, 2025
Hearing Time: 1:30 p.m.
Courtroom: 9B
Judge: Hon. Wesley Hsu
Complaint Filed: June 13, 2024
Trial Date: not set

Case No. 2:24-cv-05026-WLH-ADS

Hearing Date: January 31, 2025
Hearing Time: 1:30 p.m.
Courtroom: 9B
Judge: Hon. Wesley Hsu
Complaint Filed: June 14, 2024
Trial Date: not set

W.P., #532

Plaintiff,

v.

1 MINDGEEK S.A.R.L. a foreign entity;
2 MG FREESITES, LTD., a foreign entity;
3 MINDGEEK USA INCORPORATED, a
4 Delaware corporation; MG PREMIUM
5 LTD, a foreign entity; MG GLOBAL
6 ENTERTAINMENT INC., a Delaware
7 corporation; 9219-1568 QUEBEC, INC.,
8 foreign entity; BERND BERGMAIR, a
9 foreign individual; FERAS ANTOON, a
10 foreign individual; DAVID TASSILLO, a
11 foreign individual; VISA INC., a Delaware
12 corporation; REDWOOD CAPITAL
13 MANAGEMENT, LLC, a Delaware
14 limited liability company; REDWOOD
15 DOE FUNDS 1-7; COLBECK CAPITAL
16 MANAGEMENT, LLC, a Delaware
17 limited liability company; COLBECK
18 DOE FUNDS 1-3,

Defendants.

A.K.,

Plaintiff,

v.

14 MINDGEEK S.A.R.L. a foreign entity;
15 MG FREESITES, LTD., a foreign entity;
16 MINDGEEK USA INCORPORATED, a
17 Delaware corporation; MG PREMIUM
18 LTD, a foreign entity; MG GLOBAL
19 ENTERTAINMENT INC., a Delaware
20 corporation; 9219-1568 QUEBEC, INC.,
21 foreign entity; BERND BERGMAIR, a
22 foreign individual; FERAS ANTOON, a
23 foreign individual; DAVID TASSILLO, a
24 foreign individual; VISA INC., a Delaware
25 corporation; REDWOOD CAPITAL
26 MANAGEMENT, LLC, a Delaware
27 limited liability company; REDWOOD
28 DOE FUNDS 1-7; COLBECK CAPITAL
MANAGEMENT, LLC, a Delaware
limited liability company; COLBECK
DOE FUNDS 1-3,

Defendants.

Case No. 2:24-cv-05185-WLH-
ADS

Hearing Date: January 31, 2025
Hearing Time: 1:30 p.m.
Courtroom: 9B
Judge: Hon. Wesley Hsu
Complaint Filed: June 20, 2024
Trial Date: not set

Case No. 2:24-cv-05190-WLH-
ADS

Hearing Date: January 31, 2025
Hearing Time: 1:30 p.m.
Courtroom: 9B
Judge: Hon. Wesley Hsu
Complaint Filed: June 20, 2024
Trial Date: not set

J.L., #533

Plaintiff,

v.

1 MINDGEEK S.A.R.L. a foreign entity;
2 MG FREESITES, LTD., a foreign entity;
3 MINDGEEK USA INCORPORATED, a
4 Delaware corporation; MG PREMIUM
5 LTD, a foreign entity; MG GLOBAL
6 ENTERTAINMENT INC., a Delaware
7 corporation; 9219-1568 QUEBEC, INC.,
8 foreign entity; BERND BERGMAIR, a
9 foreign individual; FERAS ANTOON, a
10 foreign individual; DAVID TASSILLO, a
11 foreign individual; VISA INC., a Delaware
12 corporation; REDWOOD CAPITAL
13 MANAGEMENT, LLC, a Delaware
14 limited liability company; REDWOOD
15 MASTER FUND, LTD, a foreign
16 entity; MANUEL 2018, LLC, a
17 Delaware limited liability company;
18 GINOGERUM, LLC, a Delaware
19 limited liability company; WHITE
20 HATHAWAY OPPORTUNITY, LLC,
21 a Delaware limited liability company, CB
22 MEDIA VENTURES LLC, a Delaware
23 limited liability company; CB AGENCY
24 SERVICES, LLC, a Delaware limited
25 liability company; and CB
26 PARTICIPATIONS SPV, LLC, a
27 Delaware limited liability company,
28

Defendants.

Case No. 2:24-cv-07046-WLH-ADS

Hearing Date: January 31, 2025
Hearing Time: 1:30 p.m.
Courtroom: 9B
Judge: Hon. Wesley Hsu
Complaint Filed: August 20, 2024
Trial Date: not set

1 Defendants Feras Antoon and David Tassillo's Omnibus Motion to Dismiss
2 the Complaints filed in the above-captioned actions (collectively, the "Related
3 Actions") pursuant to Federal Rules of Civil Procedure 12(b)(2), 12(b)(6) and 9(b)
4 ("Antoon and Tassillo's Omnibus Motion to Dismiss") came before this Court for
5 hearing on January 31, 2025. Having considered the papers and arguments of
6 counsel submitted in connection with Antoon and Tassillo's Omnibus Motion to
7 Dismiss, and finding good cause appearing, IT IS HEREBY ORDERED THAT:

8 Antoon and Tassillo's Omnibus Motion to Dismiss is GRANTED; and
9 Plaintiffs' claims in the Related Actions against Antoon and Tassillo are
10 DISMISSED WITHOUT LEAVE TO AMEND for failure to establish personal
11 jurisdiction and, in the alternative, DISMISSED WITH PREJUDICE for failure to
12 state a claim.

13
14 **IT IS SO ORDERED**

15 Dated: _____

16 Hon. Wesley L. Hsu
17 United States District Judge
18
19
20
21
22
23
24
25
26
27
28

[PROPOSED] ORDER GRANTING ANTOON AND TASSILLO'S
OMNIBUS MOTION TO DISMISS THE COMPLAINTS